

Hearing Date: October 19, 2010
Hearing Time: 10:00 AM (EST)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR
PROTECTION CORPORATION,

Plaintiff,

vs.

**Bankruptcy Case No.
08-01789 (BRL)**

SIPA Liquidation

(Substantively Consolidated)

BERNARD L. MADOFF
INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

JUL 13 2010

U.S. DISTRICT COURT, S.D. NEW YORK

**MEMORANDUM IN OPPOSITION TO TRUSTEE'S MOTION TO AFFIRM
TRUSTEE'S DETERMINATION DENYING CLAIMS OF CLAIMANTS
WITHOUT BLMIS ACCOUNTS IN THEIR NAMES,
NAMELY, INVESTORS IN FEEDER FUNDS**

Pursuant to the Court's Order dated April 13, 2010 (the "Order" [docket no. 2205]), Dorothy Klausner, Rev. Liv. Tr. 2nd Amendment (hereafter referred to as "Dorothy Klausner") hereby submits this Opposition to the Trustee's Motion For An Order to Affirm Trustee's Determinations Denying Claims of Claimants Without BLMIS Accounts In Their Names, Namely, Investors In Feeder Funds [docket no. 2416], and the memoranda filed by the Trustee and by SIPC in support of the same [docket nos. 2411 and 2414, respectively].

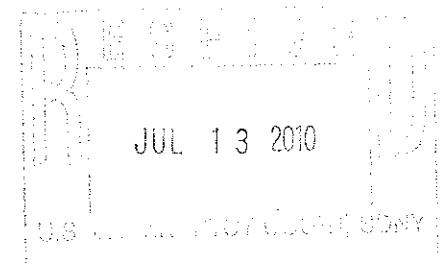
Dorothy Klausner is an "Objecting Claimant" as defined in the Order. Dorothy Klausner filed an objection to the Trustee's denial of its claim on the basis that Dorothy Klausner did not have an account at BLMIS (the "Objection" [docket no. 1302]). The Trustee's determination that Dorothy Klausner is not a "customer" under SIPC because she did not have an account in its name at BLMIS is wrong for the reasons set forth in Dorothy Klausner's Objection. In the interest of preserving judicial resources, Dorothy Klausner hereby incorporates by reference as if fully restated herein the arguments set forth in the Objection as to why Dorothy Klausner should be treated as a customer under SIPA.

Dorothy Klausner also hereby joins and incorporates by reference as if fully restated herein the arguments and authority cited in the objections and oppositions filed on behalf of all similarly situated Objecting Claimants as to why the Trustee's determination on the customer issue is wrong.

Dated: July 12, 2010

Dorothy Klausner *Bul*

Dorothy Klausner, trustee



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